

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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In re: Geraldine Bernadin

Debtor

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Debtor

v.

U.S. Bank National Association as Trustee,  
Successor in Interest Wachovia Bank  
National Association, as Trustee for Merrill  
Lynch Investors Trust, Mortgage Loan Asset  
Backed Certificates, Series 2005-A6, *et al*

Defendants  
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CHAPTER 13

BANKRUPTCY NO. 18-12717  
(ELF)

Adv. # 18-00281 (ELF)

**STIPULATION FOR EXTENSION OF TIME**

1. On August 11, 2020, counsel for Debtor, Geraldine Bernadin (“Debtor”), and Defendants, U.S. Bank National Association, as Trustee, Successor in Interest to Wachovia Bank National Association as Trustee for Merrill Lynch Investors Trust, Mortgage Loan Asset Backed Certificates, Series 2005-A6 and Ocwen Loan Servicing, LLC (collectively, “Defendants”) (“Debtor” and “Defendant” shall be collectively referred to as the “Parties”) notified this Honorable Court that the instant adversary proceeding had been tentatively settled and that the Parties were in the process of finalizing documents to memorialize their agreement.

2. Pursuant to Local Rule 7041-1, the Parties have until September 10, 2020 to “file a stipulation, motion or other appropriate document that implements” the resolution that the Parties have reached.

3. During the past several weeks, the Parties' counsel have worked diligently to finalize all of the terms and conditions of their tentative settlement agreement.

4. However, the Parties have yet to reach a complete agreement on all of the terms and conditions of their final confidential settlement agreement and do not believe that they will be able to do so on or before September 10, 2020.

5. In addition, in order to finalize their written agreement, the Parties require confirmation from the Chapter 13 Trustee that he has no objection to the proposed settlement terms. However, the Parties recently learned that counsel for the Trustee is on vacation until the end of this week and will not be able to provide this confirmation until next week at the earliest.

6. Accordingly, the Parties respectfully request that this deadline be extended by thirty (30) days in order to provide the Parties with ample time to seek to finalize an agreement.

WHEREFORE, the Parties respectfully request that this Court approve the instant stipulation and provide a thirty (30) day extension of the Parties' deadline to file a stipulation, motion or other appropriate document implementing the Parties' tentative settlement agreement.

Dated: September 8, 2020

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Approved by the Court.

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Hon. Eric L. Frank